

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION

CRAIG CARGILE, ADMINISTRATOR OF  
THE ESTATE OF JOHN B. MCLEMORE,

PLAINTIFF,

CASE No: 7:18-cv-01167-LSC

V.

JUDGE L. SCOTT COOGLER

SERIAL PRODUCTIONS, LLC;  
THIS AMERICAN LIFE PUBLIC  
BENEFIT CORPORATION;  
BRIAN REED;  
CHICAGO PUBLIC MEDIA, INC.;  
SHITTOWN, LLC;  
SERIAL PODCAST, LLC; AND  
AMERICAN WHATEVER, LLC,

DEFENDANTS.

**MOTION TO APPEAR PRO HAC VICE**

Come now Defendants, pursuant to N.D. Ala. LR 83.1, and respectfully move this Court to grant *pro hac vice* admission to CHELSEA T. KELLY (“Applicant”) as co-counsel for Defendants in the above-captioned matter. In support thereof, Defendants provide the following:

1. Applicant resides at 2516 17<sup>th</sup> Street NW, Apt. 4, Washington, DC 20009.

2. Applicant is an attorney and associate with Davis Wright Tremaine LLP, 1919 Pennsylvania Avenue NW, Suite 800, Washington, DC 20006, Tel.: (202) 973-4250, Fax: (202) 973-4450, [chelseakelly@dwt.com](mailto:chelseakelly@dwt.com).

3. Applicant has been a member of the New York State Bar since May 11, 2015 and the District of Columbia Bar since September 8, 2017. She is also admitted to the bar in the United States District Court for the Southern District of New York, the United States District Court for the District of Columbia, and the United States Court of Appeals for the Eleventh Circuit.

4. Applicant is in good standing and eligible to practice in all courts to which admitted.

5. Applicant is associated with undersigned designated local counsel Dennis Bailey, Rushton, Stakely, Johnston & Garrett, P.A., in Montgomery, Alabama, who is admitted to the bar of this Court and who has also been retained by Defendants in the above-captioned matter.

6. A Certificate of Good Standing from the District of Columbia Bar is attached hereto.

7. Applicant is not presently, nor has she ever been, the subject of any disbarment or suspension proceedings.

8. Applicant further certifies that she shall submit to the local rules of this Court, the rules of professional conduct, and all other requirements of the Northern District of Alabama.

9. Applicant, by signing this Motion, consents to be designated local counsel.

WHEREFORE, Defendants respectfully request this Court to enter an Order granting pro hac vice admission to the Applicant in the above-captioned matter.

Respectfully submitted,

/s/Dennis R. Bailey

Dennis R. Bailey

Bar ID ASB-4845-I71D

*Attorneys for Defendants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 17, 2019, a copy of the foregoing was served by filing the same through the CM/ECF system, which will send a copy to the following individuals:

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/s/ Dennis R. Bailey  
Of counsel